

REMARKS

Claims 1-19 are pending in this application. By this Amendment, claims 1, 5, 9 and 10 are amended. The amendments introduce no new matter as they are supported by at least paragraphs [0060] - [0063]. Reconsideration of the application is respectfully requested.

The Office Action, in paragraph 2, rejects claims 1-3, 5-7, 9 and 10 under 35 U.S.C. §102(e) over U.S. Patent No. 6,259,405 to Stewart et al. (hereinafter "Stewart"). The Office Action, in paragraph 4, rejects claims 4 and 8 under 35 U.S.C. §103(a) over Stewart as applied to claim 1, and further in view of Official Notice. These rejections are respectfully traversed.

Stewart teaches a geographic-based communications service system that includes a network and a plurality of access points connected to the network and arranged at known locations in a geographic region so that a mobile user may use a portable computing device to connect to the network and access information or services from the network (Abstract). The Office Action, with reference to Fig. 1A of Stewart, indicates that Stewart's portable computing device (PCD) 110A is considered to correspond to a first device and Stewart's service provider 140 is considered to correspond to a second device (col. 5, line 62 - col. 6, line 5).

Claims 1, 5, 9 and 10 recite, among other features, the first device possesses a scanner function, the second device possesses a printer function, and the specific data includes image data. The "devices" that the Office Action alleges correspond to the first and second devices recited in the claims do not possess the recited functions. As such, the devices of Stewart cannot reasonably be considered to teach, or even to have suggested, the first and second devices recited in independent claims 1, 5, 9 and 10.

For at least this reason, Stewart does not anticipate or render obvious the subject matter recited in independent claims 1, 5, 9 and 10. Claims 2-4 and 6-8 are also neither

taught, nor would they have been suggested, by Stewart, or Stewart in view of Official Notice, for at least the respective dependence of these claims on independent claims 1 and 5, as well as for the separately patentable subject matter which each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejections of claims 1-10 under 35 U.S.C. §§102(e) and 103(a) over Stewart are respectfully requested.

The Office Action, in paragraph 5, rejects claims 11 and 13-19 under 35 U.S.C. §103(a) over U.S. Patent Application Publication No. 2003/0123079 A1 to Yamaguchi et al. (hereinafter "Yamaguchi") and U.S. Patents Nos. 6,832,355 to Duperrouzel et al. (hereinafter "Duperrouzel") and 6,738,812 to Hara et al. (hereinafter "Hara"). The Office Action, on page 6, rejects claim 12 under 35 U.S.C. §103(a) over Yamaguchi and Duperrouzel and Hara as applied to claim 11 above, and further in view of Stewart. These rejections are respectfully traversed.

Yamaguchi teaches a web-based image forming apparatus (Abstract). Duperrouzel teaches a display system that displays web pages from websites located on data communications networks in a plurality of non-overlapping display areas (Abstract). Hara teaches a management information-based integrative management method directed at making more efficient communications between a CPU and an ATM switch body (Abstract).

The Office Action admits that Yamaguchi does not teach a feature of "... on the screen ... are dragged-and-dropped ... hands over at least one of a location information ... and the second device service unit accesses the first device service unit ... acquires from the first device service unit ... the specific data." The Office Action, however, indicates that Duperrouzel teaches "drag-and-dropping data from one web browser to another" (citing col. 2, lines 30-35 and col. 4, lines 58-67 and Fig. 2 of Duperrouzel). The Office Action then indicates that Duperrouzel is silent in regard to acquiring the first device specific data, relying on Hara as teaching this aspect. The Office Action then concludes that (1) the devices of

Yamaguchi, Duperrouzel and Hara all relate to communication systems and (2) adding the above features to Yamaguchi's device would result in a more efficient image forming apparatus because it would provide enhanced functionality.

Applicants respectfully submit that: (1) the references are not combinable in the manner indicated in the Office Action; (2) no motivation for one of ordinary skill in the art to combine the references in the manner indicated in the Office Action is provided in any of the references; (3) the alleged motivation to combine asserted in the Office Action to add the features of Duperrouzel and Hara to Yamaguchi does not meet the standard of specificity required to show motivation to combine the references; and (4) to the extent that the references may be combinable, any such combination does not suggest the specific combinations of features recited in at least independent claims 11, 15, 18 and 19.

In support of these positions, first, Applicants contend that it is only through the application of inappropriate hindsight reasoning based on Applicants' disclosure that any arguable combination of all of the features would have been suggested. Specifically, Yamaguchi is directed at a printer device with a capability of directly accessing a web server to produce hard copy images of data obtained from the web server without passing through an information processing apparatus (paragraph [0009]). Yamaguchi explains that this is accomplished by executing through an operation unit 5 depicted in Fig. 3, a request for the data by specifying a command for designating URL information or a command for designating access frequency information via an input unit 302 wherein a display 301 is used to perform an input guidance or the like of address information of a URL or the like of the hypertext on the network and access frequency from the hypertext (see, e.g., paragraph [0102]). Such a printer-based device is not combinable with displaying a web page on a screen and/or dragging and dropping data from one web browser to another, as is arguably disclosed in Duperrouzel, or with acquiring from a first device with a scanning function

specific image data, as is arguably disclosed in Hara. In fact, such a combination would change the principle of operation of the Yamaguchi system by reintroducing "an information processing apparatus."

Second, MPEP §2143.01 instructs that "[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." MPEP §2143.01 further instructs that "[a]lthough a prior art device 'may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so.'" *See also In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990). Applicant respectfully submits that the rejection of at least independent claims 11, 15, 18 and 19 is improper in view of at least MPEP §2143.01 because the Office Action fails to set forth the required specific evidence of a teaching, suggestion or motivation in the references for one of ordinary skill to combine the references.

Third, Duperrouzel at col. 2, lines 30-35 and col. 11, lines 25-37, discloses drag-and-dropping any URL that is displayed in one display pane into another display pane to display a web page that has the particular URL in the other display pane. Duperrouzel, however, provides no teaching or suggestion of the web page including data symbols for displaying the specific data on a screen wherein the data symbols on the screen included in the web page used for the first device are dragged and dropped in a predetermined area of the web page used for the second device, as variously recited in independent claims 11, 15, 18 and 19.

These data symbols represent an image corresponding to the image data read by, for example, a scanner and held by a device service unit to be displayed in the web page of the first device, the image may be displayed unaltered, as per the image data, or be displayed as a so-called thumbnail image, or another icon or figure, corresponding to the image data may be displayed. Duperrouzel suggests no such feature.

For at least these reasons, Applicants respectfully submit that the combination of Yamaguchi, Duperrouzel and Hara cannot reasonably be considered to have suggested all of the features recited in at least independent claims 11, 15, 18 and 19. Further, claims 12-14, 16 and 17 are also not suggested by any permissible combination of the applied references at least in view of their dependence on independent claims 11 and 15, as well as for the separately patentable subject matter which each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejections of claims 11-19 under 35 U.S.C. §103(a) over the combinations of the applied references are respectfully requested.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-19 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff
Registration No. 27,075

Daniel A. Tanner, III
Registration No. 54,734

Attachment:
Petition for Extension of Time

JAO:DAT

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OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

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